



Louis Leon <lleon@cafaro.esq.com>

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**Re: Chinca v. Patel**

1 message

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**Louis Leon** <lleon@cafaro.esq.com>

Wed, Jul 8, 2020 at 2:44 PM

To: Jason Mizrahi <Jason@levinepstein.com>

Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>

Jason:

We can't consent to an extension of this deadline. This week was not cut short by the holiday weekend. Furthermore, as you will remember, you originally asked me for a month plus to respond to our motion for reconsideration, but you ultimately agreed to Fridays' deadline. I'm sure you knew about your "back-to-back mediations" at that time. This case has been needlessly delayed by what happened at Plaintiff's deposition. Let's not continue delaying things.

**Sincerely,  
Louis M. Leon, Esq.  
Associate**

Description: Doc1

108 West 39<sup>th</sup> Street, Suite 602

New York, NY 10018

Main (212) 583-7400

Fax. (212) 583-7401

[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)

On Wed, Jul 8, 2020 at 2:32 PM Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)> wrote:

Our office has two conflicting back-to-back mediations coming up.

We are also operating on a short week due to the long holiday weekend.

Jason

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Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170

Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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-----Original Message-----

From: Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
Sent: Wednesday, July 8, 2020 2:24 PM  
To: Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
Cc: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
Subject: Re: Chinca v. Patel

Why do you need the extension of time?

Sincerely,  
Louis M. Leon  
Sent from my iPhone

> On Jul 8, 2020, at 2:08 PM, Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)> wrote:

>

> Louis,

>

> To clarify, we're seeking an extension to Wednesday (7/15).

>

>

> \_\_\_\_\_  
> Jason Mizrahi, Esq.  
> Levin-Epstein & Associates, P.C.  
> 420 Lexington Ave., Suite 2525  
> New York, NY 10170  
> Phone: (212) 792-0048  
> Mobile: (301) 758-7351  
> Facsimile: (646) 786-3170  
> Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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> -----Original Message-----

> From: Jason Mizrahi  
> Sent: Wednesday, July 8, 2020 2:05 PM  
> To: Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
> Cc: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
> Subject: RE: Chinca v. Patel

>

> Hi Louis,

>  
> I just tried your line but couldn't reach you.  
>  
> Can you please return my call? We'd like to request an extension of the July 10, 2020 Opposition Filing Deadline.  
>  
> Do you consent? Please let me know so I can inform the Court.  
>  
> Jason  
>  
>  
> \_\_\_\_\_  
> Jason Mizrahi, Esq.  
> Levin-Epstein & Associates, P.C.  
> 420 Lexington Ave., Suite 2525  
> New York, NY 10170  
> Phone: (212) 792-0048  
> Mobile: (301) 758-7351  
> Facsimile: (646) 786-3170  
> Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
>  
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>  
> -----Original Message-----  
> From: Jason Mizrahi  
> Sent: Thursday, June 25, 2020 10:15 AM  
> To: Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
> Cc: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
> Subject: RE: Chinca v. Patel  
>  
> Louis,  
>  
> Good morning. July 10th is fine.  
>  
> We consent.  
>  
> Jason  
>  
> -----Original Message-----  
> From: Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
> Sent: Wednesday, June 24, 2020 8:01 PM  
> To: Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
> Cc: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
> Subject: Re: Chinca v. Patel  
>  
> Jason:  
>  
> That doesn't really sound plausible. If we are asking for the motion deadline to be extended by five days, the opposition deadline should also be extended by five days only. That brings us to July 7. If you want, we would agree to extend the opposition deadline to July 10, but I don't think the judge will appreciate more than that. Please let me know ASAP.  
>

> Sincerely,  
> Louis M. Leon  
> Sent from my iPhone  
>  
>> On Jun 24, 2020, at 6:15 PM, Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)> wrote:  
>>  
>> Louis,  
>>  
>> We are amenable to an extension of time to file the motions to 6/30, with oppositions being due on 7/21, in light of the 4th of July holiday.  
>>  
>> Jason  
>>  
>>>> On Jun 24, 2020, at 4:46 PM, Louis Leon <[lleon@cafaroescq.com](mailto:lleon@cafaroescq.com)> wrote:  
>>>>



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